

July 24, 2020

The Motivational Incentives Policy Group

The Honorable Alex M. Azar II
Secretary, U.S. Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, S.W.
Washington, D.C. 20201

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RE: Considerations Surrounding Implementation of Motivational Incentives (Contingency Management) in Treatment of Stimulants (e.g. methamphetamine and cocaine)

Dear Mr. Azar:

We are writing on behalf of major national organizations that serve and advocate for Americans suffering from substance use disorders. We ask you to authorize a **2-year waiver** of the HHS OIG interpretation of the Anti-Kickback Statute and Civil Monetary Penalties as these as they are applied to the implementation of **Motivational Incentives** for treatment of stimulant use disorders.

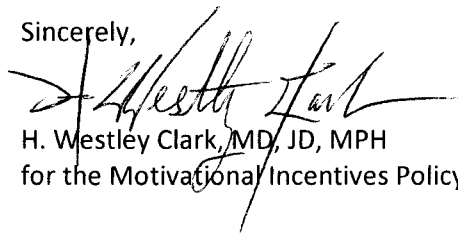
Extensive research shows Motivational Incentives (also known as Contingency Management) to be the most robust, evidence-based, and cost-effective treatment for stimulant use disorders – which has no known medication treatment. Growing adoption by multiple state and national commercial insurers, as well as state Medicaid agencies and single state substance abuse authorities, attests to the effectiveness and cost-savings of this intervention.

The COVID-19 epidemic and the concurrent opioid and stimulant disorder epidemics reveal a bleak outlook for US drug-related mortality. Beyond the ongoing opioid epidemic, the next epidemic is already emerging: stimulant use disorders. From 2012–2018, cocaine overdose deaths have more than tripled and deaths involving stimulants (e.g. methamphetamine) have risen nearly 6-fold.

In the midst of this crisis of overdose deaths from stimulants and the COVID-19 epidemic implementing effective, cost-effective treatment such as motivational incentives (contingency management) in treatment programs is critical. Please see the attached infographic, Clinical and Cost Effectiveness document, and Legislative Proposal.

Thank you for your immediate attention to this issue of national importance.

Sincerely,



H. Westley Clark, MD, JD, MPH
for the Motivational Incentives Policy Group

A non-commercial, independent, advocacy group promoting the adoption of Motivational Incentives for routine use, nationwide, in the treatment of substance use disorders.

SUPPORTING ORGANIZATIONS

- The American Academy of Addiction Psychiatry
 - The American Psychological Association
 - Black Psychiatrists of America
 - DynamiCare Health, Inc.
- NAADAC - The Association for Addiction Professionals
- The National Association of Addiction Treatment Providers
 - The National Association for Behavioral Healthcare
 - The National Council for Behavioral Health
- The New England Association of Drug Court Professionals
 - Ria Health, P.C.
 - Young People in Recovery
 - WEconnect Health Management

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